

[illegible]

Standard
95%
95%
95%
95%
95%
95%
POTS (Res/Bus & FW)
POTS (Res/Bus & FW)
VGPL
VGPL
ISDN BRI
DS1 and ISDN PRI
DS1
DS3
DS3
Ameritech Affiliate
5% (No critical z-value applies)
POTS (Res/Bus & FW)
POTS (Res/Bus & FW)
VGPL
VGPL
ISDN BRI
DS1 and ISDN PRI
DS1
DS3
DS3
Ameritech Affiliate
5% (No critical z-value applies)
POTS (Res/Bus & FW)
VGPL
VGPL
ISDN BRI
DS1 and ISDN PRI
DS1
DS3
DS3
Ameritech Affiliate
5% (No critical z-value applies)
90% LAT on the Due Date

SERVICE LIST

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Louis
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ATTACHMENT B

-----Original Message-----

From: Rod Cox [<mailto:rcox@McLeodUSA.com>] <[mailto:\[mailto:rcox@McLeodUSA.com\]](mailto:[mailto:rcox@McLeodUSA.com])>
Sent: Tuesday, August 15, 2000 12:35 AM
To: Fioretti, Salvatore T (AIT)
Cc: Todd G. McNally; WALSH, KEVIN (AIT); Thornton, Roland (AIT); SHEDLOCK, MARY (AIT); Stacey D. Stewart
Subject: Re: New McLeod Measures



Mac Word 3.0

Sal...We are okay with the changes but need Ameritech to follow-up on the other issues we discussed on the last call.

- Centrexmate performance measures and tracking
- Gap closure plans (beyond remedies)
- Breakdown performance tracking for MACs (beyond the proposed measures)
- Flow through opportunities /improvements for CTX orders

"Fioretti, Salvatore T (AIT)" <salvatore.T.fioretti@msg.ameritech.com <<mailto:salvatore.T.fioretti@msg.ameritech.com>>>
on

08/11/2000 04:56:35 PM

To: Rod Cox/MCLEOD@MCLEOD, Todd G. McNally/MCLEOD@MCLEOD
cc: "WALSH, KEVIN (AIT)" <KEVIN.WALSH@msg.ameritech.com <<mailto:KEVIN.WALSH@msg.ameritech.com>>>, "Thornton, Roland (AIT)" <roland.thornton@msg.ameritech.com <<mailto:roland.thornton@msg.ameritech.com>>>, "SHEDLOCK, MARY (AIT)" <MARY.SHEDLOCK@msg.ameritech.com <<mailto:MARY.SHEDLOCK@msg.ameritech.com>>>
Subject: Re: New McLeod Measures

Rod,
Todd,

In follow-up to our conversation last Friday, attached is an updated document which reflects our acceptance of your offer to re-consider the timing of implementing the 95% benchmark in consideration of the fact that it is already August.

Please respond as to whether you agree, and we'll make plans to introduce the business rules at the Illinois collaborative next week. You'll note that I included reference to the measures in the business rules that I distributed this morning

. <<McLeod PM2 081000.doc>>

Office: 847-248-4143
Page: 888-582-4890
Fax: 847-248-3198

Ameritech Measurement of CIA Centrex
(Previously known as Telemanagement)

Ameritech will implement the following performance measurement disaggregations effective with May results (re-stated back to May). These performance measurements will be implemented by August reporting with remedies first payable reflecting August data. The parties will jointly review these performance measurements and their applicability in first quarter 2001. The following is a summary of the modifications that Ameritech is proposing. Also attached are the redlined Draft Business Rule modifications to be jointly presented at the next Ohio/Illinois performance measure collaboratives for incorporation into the regional performance measurement plans.

Firm Order Confirmation (FOC)

- For FOC measurement "% FOC within "X" hours" (PM#5), we would split out the measurement into a new disaggregation called CIA Centrex. Our objective would be to get to 95% within 24 hour FOC benchmark (for <200 Lines) by September. We would begin measuring to an 85% benchmark in ~~July~~ August, a 90% benchmark in ~~August~~ September, and a 95% benchmark in ~~September~~ October.
- For FOC measurement "Average Time to return FOC" (PM#6), we would also split out the measurement into a new disaggregation called CIA Centrex.

Installation Interval

- For Installation Interval "Mean Installation Interval - POTS (PM#27), we would split out the measurement into a new disaggregation called CIA Centrex. Both Field Work (FW) and No Field Work (NFW) would still be measured. The Business FW disaggregation would be compared to parity, as it is done today. The Business NFW orders would be compared to a 4-business day benchmark which would be reviewed jointly in the first quarter 2001 for applicability.
- For Percent Installations Completed within "X" Business Days - POTS (PM#28), we would split out the measurement into a new disaggregation called CIA Centrex. Both Field Work (FW) and No Field Work (NFW) would still be measured. The Business FW disaggregation would be compared to Retail on the basis of a 5-business day interval as it is done today. The Business NFW disaggregation would also be compared to a benchmark of 95% within 5 business day benchmark. This benchmark would also be reviewed jointly in the first quarter 2001 for applicability.

CIA Centrex is reflected in the categories for "POTS Business" for all other measurements in state specific performance measurements.

Ameritech will also commit to providing additional analysis of performance data further disaggregated by type of order (Move, Add, and Change), as requested. These requests should be directed to the Service Manager who will coordinate the analysis with the Service Center and the Performance Measure Analysis teams.

5. Measurement:**Percent Firm Order Confirmations (FOCs) Returned Within "X" Hours****Definition:**

Percent of FOCs returned within a specified time frame from receipt of a complete and accurate service request to return of confirmation to CLEC.

Exclusions:

- Rejected (manual and electronic) service requests.
- Ameritech retail disconnect orders in conjunction with wholesale migrations.
- Service requests involving major projects mutually agreed upon by CLECs and Ameritech. For Resale and CPO a project is defined as > 250 lines, trunks, circuits, and/or telephone numbers. For Loops, LNP, LSNP, a project is defined as > 100 lines, trunks, circuits, and/or telephone numbers.
- Where CLEC accesses Ameritech – LEC's systems using a Service Bureau Provider, the measurement of Ameritech – LEC's performance shall not include Service Bureau Provider processing, availability or response time.

Business Rules:

Orders are measured according to how the service order was submitted to Ameritech (i.e., electronically or manually) and are included in these disaggregations regardless of how they are processed. Ameritech will measure Unsolicited FOCs as Jeopardies

Manually Submitted:

Manual service order requests are those initiated via the CLEC by fax. The receive date and times are recorded and input on each service order in the ordering system for each FOC opportunity. The end times are the actual dates and times the FOCs are sent back to the CLEC via EDI-to-Fax. FOC business rules are established to reflect the Local Service Center (LSC) normal hours of operation as posted on the internet. If the receipt time is outside of normal business hours, then the start date/time is set to the beginning of the next business day. Example: If a request is received Monday through Friday between 7:00 a.m. to 5:00 p.m.; the valid start time will be Monday through Friday between 7:00 a.m. to 5:00 p.m. If the actual request is received Monday through Thursday after 5:00 p.m. and before 7:00 a.m. the next day; the valid start time will be the next business day at 7:00 a.m. If the actual request is received Friday after 5:00 p.m. and before 7:00 a.m. Monday; the valid start time will be at 7:00 a.m. Monday. If the request is received on a holiday (anytime); the valid start time will be the next business day at 7:00 a.m. The returned confirmation to the CLEC will establish the actual end date/time.

Electronically Submitted:

FOC business rules are established to reflect the electronic interface normal hours of operation, as posted on the internet, excluding holidays and Sundays. For electronically originated service requests, the start date and time is the receive date and time that is automatically populated by the interface. The received date and time is automatically populated with the system date time once all ordering edits are satisfied. The end date and time is recorded by the interface and reflects the actual date and time the FOC is returned to the CLEC. The EDI data is captured within MOR and is used to calculate the FOC measure.

For orders where FOC times are negotiated with the CLEC, the entry on the ACIS service order is used in the calculation. The request type is determined from the order class and order type tables to report the various levels of disaggregation.

ATTACHMENT C

Illinois Commerce Commission
SBC/Ameritech Illinois Merger, Docket 98-0555
Performance Benchmarks Collaborative, Condition 30
Final Meeting Minutes From 8/16-17/2000
Reviewed and Approved 9/20/2000

The eighth Illinois Performance Measure Collaborative was held on August 16 and 17, 2000. Day 1 was held at the State of Illinois Building, Room N-505. Day 2 was held at the James R. Thompson Center (100 W. Randolph St., Chicago, IL), in conference room 8-032, and the Holiday Inn Mart Plaza, Sauganash Room, in conjunction with the Ameritech Change Management Process Meeting. Participants also attended the meetings via a conference bridge. Following are the minutes and action items from the meeting.

Mr. McClerren, ICC Staff, presided over the meeting.

August 16, 2000

I. Introductions

- A. Staff, Ameritech Illinois, CLECs, Other Parties
- B. Sign up sheet, with contact name, address, phone & e-mail address

II. Administrative Matters

- A. Meeting Procedures
 - 1. Subject Matter Experts (SMEs) participation recommended
 - 2. Discussions "off the record" until final positions are developed
 - 3. Final positions, decisions, agreements, disagreements, documents to be documented
 - 4. Business casual attire

III. Review and Approve Meeting Minutes From 7/11-12

The review and approval of the meeting minutes was postponed until 8/17 to allow additional time for parties to review the draft minutes.

IV. Proposed Penalty Mechanisms

(Note: To accommodate schedules, the proposed penalty mechanism was handled first, contrary to the agenda). The CLECs distributed a "CLEC Proposed Remedy Plan for Ameritech" document at the beginning of the meeting, which was a documentation of the CLECs unified position on the policy and guidelines of remedy plans. AT&T, CoreComm, McLeodUSA, WorldCom and Z-Tel participated in the joint effort to create a uniform CLEC position on remedies. They are inviting more Illinois CLECs to

participate in the finalization of a uniform CLEC stance on the issue. Sprint still supports its proposal presented at the July 11 collaborative, stating that they would not oppose the CLEC proposal, indicating that anything better than Ameritech's current plan would be preferable. However, John Idoux pointed out that they would rather have their proposal go through. It was noted that the document was an initial agreement, and that the contents are subject to change.

CLECs pointed out that the key difference between their proposed plan and the Texas plan was the way it calculated remedies past the first month of failure. In contrast with the Texas plan, the CLEC plan's remedies escalate with repeated failure and continue to escalate for the life of the plan. Ameritech's plan escalates with repeated failure, but remedies return to normal levels when Ameritech meets the performance measure standards in a subsequent month. The CLEC plan also contains some provisions similar to the Texas Plan and is not as complicated.

References were made to the calculation of the review threshold for total remedies in New York, and how the New York Public Service Commission raised the penalties for Bell Atlantic from the FCC's initial recommendation of 36 percent of total revenue to 44 percent of total revenue. The CLECs asserted that they would prefer the 44 percent of total revenue threshold, but that the threshold should be, at a minimum, 36 percent (representing \$361 million). In the SBC/Ameritech Illinois merger order, the current guidelines for remedies are an annual remedy cap of \$90 million once the performance measurements are implemented. Mr. McClerren referred to the Texas situation, and stated that the Illinois \$90 million cap was based on an access line allocation of the \$120 million cap in Texas. Mr. McClerren noted that the original cap for Texas was adjusted from \$120 million up to \$236 million before the Condition 271 application in Texas was approved. Ameritech supports the 36% cap as a hard cap.

Furthermore, the Z-test in the CLEC proposal was used for parity measures and not benchmarks. The authors of the proposal commented that the proposed remedy plan was designed with the goal of capturing the magnitude of impact on CLECs due to performance measure failures, and that the use of the modified z score balances the risk of false results between SBC/Ameritech Illinois and the CLECs.

The CLEC's proposal also differ with Ameritech's in the respect that they do not classify performance measures as "high", "medium" and "low". The CLEC proposal treats all performance measures as the same under the rationale that they believe different performance measures are significant to different CLECs, and would not like the measures to be "weighted". The CLEC plan does, however, provide for the higher impact of installation interval and missed due date measures.

Two tiers are used in the CLECs proposal for remedy payments. Tier I concerns the payment to individual CLECs and Tier II are payments to the state when Ameritech's poor performance affects the market as a whole. The lower the competition, the higher the pay amount. Benchmarks are dealt with in pretty much the same manner, except Z-scores are not used. The chronic remedy plan contained in the document was

adopted from Sprint's remedy plan. The proposal works in a manner that when Ameritech fails a measurement for a duration of time, succeeds for a month, and fails the measurement again, the remedy would pick up where it left off, rather than having the amount reset. This insures the CLECs that Ameritech will carry out their job, instead of having repeated intervals of failed measures.

Both CLECs and Ameritech have voiced that they would prefer to have a uniform 5 state plan instead of individual state plans. CLECs stated that they are willing to work with Ameritech on this subject, and the CLEC community will continue to work together in order to generate a joint plan for all five states.

Further discussion on the remedy plans and where they are going will take place during next month's Performance Measure collaboratives, which are scheduled to be held on September 19-20, 2000. An intermediary meeting to discuss the remedy plans are encouraged.

CLECs reiterated that although the remedy will serve as the primary guideline, if they feel like this is not enough, they have the right to resort to measurements under the interconnection agreement in addition to the remedy. CLECs will also follow up on their proposal and complete it; clarifying if their audit section pertains to state audit or regional audit.

V. Measure 70, Trunk Blocking Issues

Linda Samberg, SBC/Ameritech; Bill Werber, AT&T; Ken Smith, WorldCom; and Tim Cagle, Time Warner; all SMEs on trunking, attended the trunk blocking issues discussion.

Measure 70 currently measures the percentage of call blocking, with parity to retail, and standard calculation is used for 20 day months. Ameritech stated that the reason they were linking call blocking instead of trunk blocking in this issue was because the performance measure's intention was to evaluate on the basis of call completion, rather than the design of the trunk. The measurement takes place for end trunks at the tandem level, as opposed to the end office to CLEC end office trunk. This is because blocking can only occur at the tandem level. When there is high usage between end offices, the volume simply overflows to the tandem. CLECs and Ameritech had a basic disagreement on the intention of the measure. Ameritech believes that the measurement is in place to indicate that Ameritech is providing good service for call completion. CLECs believes that the data should be utilized to pinpoint malfunctions in trunk. The current performance measure would not have problem statistics arise if figures are derived over the whole city, instead of trunk by trunk. AT&T suggested that they want the measure to be kept on a trunk group basis, and would be willing to be flexible with the remedy. The remedy would be based on specific trunk groups and whether or not their performance meets certain thresholds. CLECs also suggested that they would like the measure to have a 3 month duration on the reports, so trends can

be identified and if there is a problem that gets fixed in a timely manner, things would be fine.

Linda Samberg and Sal Fioretti, as well as Karen Kinard of WorldCom, have agreed to provide a business rule proposal on this measure by the next meeting. Remedies would be applied accordingly, based on the analysis of the broad 3 month scope of data.

VI. Status of SBC/Ameritech Waiver Request (FOC Issue)

There was no off-line progress reported on this issue. Accordingly, the following schedule still pertains:

- | | | | |
|----|----------------------------------|---|--------------|
| A. | SBC/Ameritech Direct Testimony | - | August 25 |
| B. | Staff/Intervenor Testimony | - | September 22 |
| C. | SBC/Ameritech Rebuttal Testimony | - | October 20 |
| D. | Hearings | - | November 2 |

The 12 month view for development, with 3 items that are specific to flow through, are available. Some planned enhancements to flow through include DSL and platform. CLECs have requested a FOC issue schedule.

VII. Gaining Access to Performance Measures

Ameritech filed a tariff with performance measures and business rules on July 28, 2000. A group filing will take place after additions are implemented.

SBC/Ameritech has informed the group that they are planning to move the CLEC online website to a bigger server. Mr. Fioretti hopes to have a schedule for when the server move will take place.

Mr. Fioretti will also follow up on whether Ameritech will continue to keep its position on CLECs having to sign the interconnection amendment in order to view the remedy plan. CLECs asserted that they are not looking to give a "double hit". Ameritech pointed out that there were changes to some performance measures on the website. In response to AT&T's request, Mr. Fioretti promised to provide notification when changes were made. To date, only Focal has signed an amendment to its interconnection agreement.

Mr. Fioretti notified the group that he was struggling with the geographic disaggregation of specials and UNEs. Geographic disaggregation for these products won't be available this month. Ameritech will wait 3 months to accumulate data before they distribute the information.

CLECs stated that they are interested in getting information about the tier 2 reports. Mr. Fioretti indicated he was not sure the number will be public, but he will check for next meeting.

SBC/Ameritech will be following up on if performance measure 94 will be changed to look like measure 5.

IX. Geographic Disaggregation

Mr. Fioretti provided a table on geographic disaggregation, that included information such as central office, key exchanges, etc. Illinois is divided into four main geographic regions: South, North Central, Chicago, and Chicago Suburban.

August 17, 2000

The meeting minutes from July 11-12, 2000, were reviewed and approved with additional input from Karen Kinard of WorldCom on the remedy plan discussion.

X. Draft Business Rules for Performance Measures 55 - 122

Mr. Fioretti will be distributing the business rules for performance measures 24 - 54 by August 25, 2000. Mr. Fioretti expressed that he would like to be able to present a composite of Illinois, Ohio and Michigan. The document will include Michigan standards, except for the 911 measures. It was agreed to that CLECs will have a conference call to determine their stance on the document, and that there would be a clarification call for all parties on September 15.

XI. Set Interim September Dates, As Well As October Meeting Dates

A CLEC call will take place on September 8, 2000, on 8:30 AM, depending on the outcome of the Ohio collaborative session. Bob Klipstein from AT&T will organize the setup of the conference bridge.

CLECs will submit documents and comments to Mr. Fioretti by September 12, 2000. A call between the CLECs and Mr. Fioretti will take place on September 15, 2000, from 9:00 AM to 10:00 AM. The next performance measure meeting will be on September 19-20, 2000. October meeting dates have been set for October 17-18, 2000.

XII. Business Rules for Performance Measures 27 - 54

27

Ameritech indicated that they can not change business days to calendar days because their policy is not to install on weekends. Weekends are only used sometimes to catch up on orders. Mr. Fioretti will follow up if weekends completions are either counted as Friday or Monday. AT&T asserted that they wanted the weekends dealt with in the same manner that retail counts them, because it is a parity measure. Sprint stated that they have a problem if Saturday completions are counted as Friday, but okay if Saturday completions are counted as Monday. AT&T would like the audits to indicate Saturday completions, because otherwise, the data

for the performance measure would be skewed. If products are ordered beyond offered dates, Mr. Fioretti stated that it would be excluded from the data.

AT&T requested that there be disaggregation between business and residence for UNE combo. Sprint asked that if Ameritech is unable to disaggregate between business and residence, that they make the business/residence field optional. Mr. Fioretti will follow up on this suggestion and figure out the implications of this practice.

As for Centrex resale, it has unique provisioning and characteristics, and Mr. Fioretti pointed out that he needs to clean up the business rules for consistencies. The disaggregation for Centrex resale is unique as well.

28

Mr. Fioretti has asked for more time to do additional investigation on this performance measurement. He will come back to this measurement on the September 19th meeting, and have an accurate understanding of the measurement before he agrees to it.

29

CLECs stated that they are okay with Mr. Fioretti revisiting this performance measure six months down the road.

30

Mr. Fioretti would like to wait until the Ohio collaborative sessions to discuss facility modification. Mr. Fioretti will be following up with revised language for the CLEC's request.

31

Mr. Fioretti would like to clean up some of the language pertaining to this performance measure.

32

Mr. Fioretti would like to work on the language of this measure.

33

No new advances in the performance measure.

34

Ameritech has agreed to carry out geographical disaggregation for this performance measure.

35

Ameritech stated that they do not mind the change of 10 days to 30 days.

35.1

Mr. Fioretti pointed out that conversions of customers to UNE-P is a mere record change, and there is no field work or central office work involved. Troubles that occur during this change would only be coincidental. Mr. Fioretti will be following up on the basis and rationale as to why Texas agreed to the measure.

38

Specific back end systems will be edited so there will be no need for constant update.

40

Because these business rules are from Texas, Ameritech will be modifying them to suit Illinois. Ameritech also stated that they can not and will not provide better service than they give retail because it is a parity measure. Ameritech is looking to hire 200 additional outside plant technicians.

Additional debate was carried out about what actions CLECs were supposed to carry out if huge discrepancies existed between performance measures for CLECs and Ameritech affiliates. CLECs have stated that they would like to be able to evaluate the severity of the discrepancies by themselves, with raw data provided by Ameritech. Ameritech's main concern with providing raw data is with proprietary issues. References were made to Texas, where they will be showing affiliate data in the near future. Mr. Fioretti has agreed to go back and look at the issue, but feels that he will not be coming up with a new proposal.

XIII. Change Management Forum

Several members went to the Change Management Forum to hear implementation plans on the firm order confirmation process.

ATTACHMENT D

BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Investigation Into Ameritech Wisconsin Operational Support Systems

6720-TI-160

Order

This proceeding, treated as a class 1 contested case proceeding,¹ investigates the Operational Support Systems (OSS) of Wisconsin Bell, Inc., d/b/a Ameritech Wisconsin (Ameritech). The proceeding is divided into two phases. The first phase determines the “development of [Ameritech’s] OSS performance measures and benchmarks, and how OSS performance testing should proceed.” The second phase covers the actual testing of the OSS.

Pursuant to paragraph 1 of the Commission’s July 19, 2000, Order (July 19 Order), a second round of prehearing conferences were ordered, again under the auspices of a temporary administrative law judge (ALJ). The prehearing conferences sought to determine whether certain issues could be resolved among the parties and presented to the Commission as stipulated items, and whether other issues needed to go to hearing because disputes remained as to the nature, scope, or timing of an item’s incorporation in the authorized test plan, the ultimate product of Phase I of this docket. The Commission ordered the production of a second report by the temporary ALJ, which was duly filed and reported on the stipulated or agreed issues and those identified as remaining for hearing. In addition, the report suggested action on a number of administrative items relating to the proposed OSS testing.

¹ Contrary to statements in the prior two orders of March 29 and July 19, 2000, this proceeding is not a true Class 1 contested case proceeding because no hearing is required by law with respect to the subject matter.

The Commission has reviewed the Second Report of the Temporary Administrative Law Judge (Second Report), dated October 2, 2000, and has determined to adopt the report's determinations regarding six action points as more fully discussed below. Issues not specifically set forth in Administrative Law Judge Patzke's October 13, 2000, Order to Amend Issues List are presumed resolved. The Commission orders as follows:

Resolved Issues: Attachment D of the Second Report identified resolved OSS enhancements and process improvements in Issues A-AA. Attachment E identifies resolved portions of unresolved issues. Upon review of the issues, the Commission finds the description of the issues resolved as adequate for purposes of a final order and that no hearing need be held on those resolved matters. Accordingly, insofar as the resolved issues have been agreed upon by the parties and their resolution appearing to be reasonable, the Commission tentatively concludes that the resolved matters shall be incorporated directly in the final order concluding Phase I of this docket. The Commission reserves its right to adjust any preliminary determination here in light of the determinations made following the hearing. The definitions of the resolved matters are set forth in Attachments D and E to the Second Report, which are incorporated in this order to the extent necessary.

Resolved Performance Measures (PMs): Similarly, given the parties' agreement and the reasonableness of the resolution of the PMs, the Commission adopts the Second Report's determinations regarding resolved PMs as set forth in Attachments F (Version 1.6) and G (Change Management Process for Performance Measures). The Commission defers action on the Temporary ALJ's September 25, 2000, Proposed Decision (Attachment H to Second Report),

and Ameritech's exceptions thereto, on parity with benchmark floors for 12 PMs. All aspects of this issue are hereby made subject to the hearing beginning November 28, 2000.²

Master Test Plan (MTP): Similar to the findings above, the Commission has reviewed the MTP, Version 2.0, as set forth in Attachment J to the Second Report, and tentatively finds it reasonable to provide for adoption of the MTP found therein as the foundation of the test plan to be run in Phase II of this docket.

Delegation of Routine and Non-Controversial MTP Execution Decisions: The Second Report points out that a mechanism is needed to efficiently and quickly decide non-policy administrative questions relating to the MTP. By "routine and non-controversial" the Commission means decisions regarding technical details, matters such as, but not limited to, times and locations, report formats, manner of execution (e.g. choice of software), etc., that affect the execution of the MTP rather than any substantive MTP test criteria approved by the Commission."

The Commission finds that this concern is well founded and hereby appoints the Administrator of the Telecommunications Division as its designee to make such decisions. Significant policy questions involving the MTP, and related matters, shall be referred to the Commission. Determinations of the Administrator under this provision may be appealed to the Commission in the manner provided in Wis. Admin. Code § PSC 2.66.

One specific delegation should be noted within the foregoing provision. Pseudo-CLEC testing has been determined to be a part of the overall OSS test. See paragraph 10 of the

² Administrative Law Judge Patzke's October 13, 2000, Order to Amend Issues List includes the issue of "Parity with a Floor." Pursuant to that Order, Ameritech filed testimony on November 3, 2000, consistent with its written exceptions filed on October 5, 2000, that argues for parity with retail service where applicable and against requiring

March 29, 2000 Order (March 29 Order) and in the May 3, 2000 Order Approving Retention of Third-Party Tester and Psuedo-CLEC. As part of the test, a pseudo-CLEC may need to created and appear on the Commission records to be a *bona fide*, fully certified and operational CLEC. The identity of this pseudo-CLEC is not to be disclosed to Ameritech in the interests of impartial test results. By the same token, however, creating a pseudo-CLEC in Commission records should not result in a truly legal authorization of such an entity or create distortions of Commission data used for a variety of purposes. Accordingly, the Administrator of the Telecommunications Division is delegated the authority to create and maintain in Commission records, so long as needed, a pseudo-CLEC for purposes of this docket. The Administrator shall only disclose the identity of the pseudo-CLEC to Commissioners, attorneys assigned to or supervising this docket, and such Commission staff as need to know the identity in order to implement this provision. The Administrator shall see that Commission data, accounting, and other records in any way involving CLECs are appropriately adjusted to exclude the pseudo-CLEC from affecting the correctness of the records.

Dispute Resolution: The Second Report contains an expedited dispute resolution procedure agreed to by the parties. The Commission finds the process to be reasonable and will adopt the procedure effective immediately upon issuance of this order. The procedure is attached hereto as Appendix A.

Retention of Facilitator: The Second Report also recommended that Mr. John Kern be continued as a facilitator to assist and advise staff with conferences and other activities regarding implementation and execution of the MTP through KPMG Consulting. Mr. Kern should also be

parity with a floor. The prefiling schedule in this docket affords CLECs the opportunity to rebut Ameritech's testimony.

Docket 6720-TI-160

available to staff to facilitate any further efforts to resolve any unresolved issues identified for hearing. This recommendation is reasonable under the circumstances, especially given the substantial narrowing of issues that resulted from extended use of the facilitator in the prehearing conferences. Accordingly, Mr. Kern is retained upon the same terms and conditions as before, and his work will be done in conjunction with or at the direction of staff. This extended appointment shall expire with June 30, 2001, unless otherwise ordered by the Commission.

This order shall be effective upon mailing, according to its terms. The Commission retains jurisdiction.

Dated at Madison, Wisconsin, _____

By the Commission:

Lynda L. Dorr
Secretary to the Commission

LLD:MSV:NAL:slg:g:\order\pending\6720-ti-160 4th order 11-9-00